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Attorneys for Plaintiff,  
N.D.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

N.D.

Plaintiff,

v.

BLUE CROSS OF CALIFORNIA dba  
ANTHEM BLUE CROSS and DOES 1-  
10

Defendants.

Case No. 3:24-cv-06222

**PLAINTIFF'S MOTION TO PROCEED  
UNDER PSEUDONYM**

The Plaintiff hereby moves the Court for an Order granting leave to proceed with the above captioned matter as Plaintiff under the pseudonym N.D. In support of their motion, the Plaintiff states that public disclosure of the name of the Plaintiff and the pleadings and proceedings herein would have a severely damaging impact on the life of the Plaintiff and their underage child, A.D.

This lawsuit concerns medical and mental health treatment and history that reach into the utmost private areas of the Plaintiff and their child's lives. Decl. of David Lilienstein ¶¶ 3-5. The discovery and trial of this case will necessarily require revealing details of the life of the Plaintiff, including medical and treatment records of their underage child, along with highly private and personal mental health records, and the Defendant's evaluation of those medical and treatment records. Id.

1 Because of the potential harm to the Plaintiff and child from public disclosure of the medical and  
2 treatment records of A.D., this court should permit them to proceed as N.D. and A.D. In contrast, no  
3 prejudice to the Defendant can arise from proceeding pseudonymously. The dissemination of these  
4 medical and treatment records to the public would create even greater emotional distress for the  
5 Plaintiff and their family than that which the Plaintiff has already experienced due to the Defendant's  
6 improper denial of the Plaintiff's claims. Id.

7 In support of this motion, Plaintiff asks the court for an Order that the following concurrently-  
8 filed documents may be filed under seal:

9 Unredacted Declaration of David Lilienstein in Support of Plaintiff's Motion to Proceed Under  
10 Pseudonym.

11 WHEREFORE, it is respectfully requested that this Court grant Plaintiffs leave to proceed with  
12 this matter under pseudonym and order the Clerk to impound and seal any information filed to date  
13 which reveals the Plaintiffs' true identities.

14  
15 Dated: September 6, 2024

Respectfully submitted,

16 **DL LAW GROUP**

17  
18 By: /s/ David M. Lilienstein

David M. Lilienstein

Katie J. Spielman

Attorneys for Plaintiff, N.D.